

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 30, 2001

Mark R. Johnson, Treasurer
Maersk Good Government Fund Maersk Inc.
Political Action Committee
P.O. Box 880
Madison, NJ 07940

Identification Number:

C00217471

Reference:

October Quarterly (7/1/00-9/30/00), 30 Day Post-General (10/19/00-

11/27/00) and Year End (11/28/00-12/31/00) Reports

Dear Mr. Johnson:

This letter is to inform you that as of August 29, 2001 the Commission has not received your response to our requests for additional information dated August 1, 2001. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by September 19, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Scott Walker on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division



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30 Day Post-General (10/19/00-11/27/00) and Year End (11/28/00-

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Dear Mr. Johnson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

Scott B. Walker Reports Analyst

Reports Analysis Division

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PAYROLL DEDUCTIONS

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Description	Vice President	7850.00	Masok(2)

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IN-KIND CONTRIBUTIONS

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Operating Expenditures/Other Pederal the reference observes such factors and patterns may retain the reference observes such factors and patterns may retain the reference observes and the attendance of the pedical serves Track or conserves as yet. The tional Organization PAC 000000001		pe special administrative to the property of the property frage to accoming property to the property of the pr	POR USE (S)
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Remise in-kind contributions on both Schedules A and S so as not to inflate the cash-on-hand arrows.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the denor's paycheolis during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor, 104.6(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$15 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's first-quarter community (\$90 for six pay periods) as "unitemized contributions" on Line 11(a)(ii) in the April quarterly report.

By June 20 (the closing date for the July quarterly report), 13 pay periods have passed, and the manager's aggregate contributions are \$195—still below the \$200 flamination threshold. The manager's accord-quarter contributions again are included in "unitemized contributions" in the July report.

By September 30 (the closing date for the October quarterly report), 19 pay periods have passed, and the manager's contributions reach \$285. Now the committee itemizes the total contributions received from the manager during the third quarter (\$90), providing the year-to-date total in the appropriate apace. (See item A in the illustration above.)

In-Kind Contributions

When determining whether to floinize an *in-kind contribution*, follow, the same guidelines listed above under When to hamize Receipts." See page 8 for information on how to determine the dollar value of an in-kind contribution.

in addition, add the value of the in-kind contribution to the operating expanditures total on Line 21(b) (in order to avoid inflating the cash-on-hand emount), 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at left.